

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

Associated Recovery, LLC,)	
)	
Plaintiff,)	
)	No. 1:15-cv-1723-AJT-JFA
v.)	
)	
John Does 1-44,)	
)	
Defendants.)	
_____)	

In re:

744.COM	LNМ.COM	VGJ.COM	YQT.COM
028.COM	LUOHE.COM	WYD.COM	YRN.COM
3DCAMERA.COM	MEQ.COM	XAQ.COM	YTE.COM
FNY.COM	OCU.COM	XFF.COM	YYG.COM
FX2.COM	PIXIE.COM	XSG.COM	ZDP.COM
FXF.COM	QMH.COM	YCX.COM	ZHD.COM
JTZ.COM	RUTEN.COM	YEY.COM	ZULIN.COM
KGJ.COM	SDU.COM	YGX.COM	ZZM.COM
KMQ.COM	SQG.COM	YJR.COM	
KOU.COM	TAOLV.COM	YJX.COM	
KXQ.COM	UHW.COM	YLZ.COM	
KXW.COM	VCZ.COM	YQP.COM	

**DECLARATION OF MS. REBECCA J. STEMPIEN COYLE IN SUPPORT OF
PLAINTIFF'S MOTION FOR ORDER TO PUBLISH NOTICE OF ACTION**

I, Rebecca J. Stempfen Coyle, declare as follows:

1. I am an attorney with the law firm LEVY & GRANDINETTI, attorney for the Plaintiff Associated Recovery, LLC (the “Plaintiff” or “Associated Recovery”).

2. I am fully familiar with the facts and circumstances set forth herein. This Declaration is based upon my personal knowledge and a review of the files maintained by LEVY & GRANDINETTI.

3. I submit this declaration in support of Plaintiff’s Motion For Order to Publish Notice of Action.

4. On December 31, 2015, I sent a copy of the Complaint, with all exhibits, in this matter to each of the defendants via e-mail, using the e-mail addresses provided on the Whois records for each of the Internet domain names at issue. Also on December 31, 2015, I directed that a letter be sent to each postal address including any incomplete or facially incorrect addresses as provided on the Whois records for each of the subject Internet domain names. The e-mails and letters sent notified the currently identified registrants of the alleged violations and that the Plaintiff intended to proceed *in rem* against the Domain Names. True and accurate representative copies of the e-mail and letter sent are attached as Composite Attachment 1.

5. To date I have received one response to these communications. Specifically, an e-mail response was received from a person identifying himself as Taesong Chong, who is the current registrant of the Domain Name 3dcamera.com. A true and accurate copy of this response is attached as Attachment 2.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: January 20, 2016

Respectfully,

/s/

Rebecca J. Stempien Coyle
(VSB# 71483)

Counsel for the Plaintiff

Associated Recovery, LLC

LEVY & GRANDINETTI

1120 Connecticut Avenue, N.W.

Suite 304

Washington, D.C. 20036

Telephone (202) 429-4560

Facsimile (202) 429-4564

mail@levygrandinetti.com

COMPOSITE ATTACHMENT 1

Paul Grandinetti

From: Paul Grandinetti
Sent: Thursday, December 31, 2015 2:06 PM
To: 'gaodade@gmail.com'
Subject: U.S. Federal In Rem Action Filed in Regard to Domain Name FNY.COM
Attachments: Complaint_123115_Exhibits.pdf; Complaint_123115_Stamped.pdf

Dear Sirs:

The attached Complaint has been filed in the United States District Court for the Eastern District of Virginia regarding this domain name.

Pursuant to 15 USC 1125(d)(2)(A) we are providing you with notice of the Plaintiff's intent to proceed in rem in this action.

If you have any facts or law regarding this matter that you believe we should be made aware of, please let us know.

Regards,
Rebecca Stempien Coyle

Levy & Grandinetti
1120 Connecticut Ave NW
Suite 304
Washington DC 20036

Tel. (202) 429-4560
Fac. (202) 429-4564
mail@levygrandinetti.com

Attorneys for Plaintiff
Associated Recovery, LLC

LEVY & GRANDINETTI
1120 CONNECTICUT AVENUE, N.W., SUITE 304
WASHINGTON, D.C. 20036

TELEPHONE: (202) 429-4560
FACSIMILE: (202) 429-4564
E-MAIL: mail@levygrandinetti.com

December 31, 2015

VIA AIR MAIL

Zhiqiangjin
Wenyi Road No. 75
Hangzhoushi, Zhejiang
China

Re: Domain Name FNY.COM
E.D. Va. Civil Action No. 1:15-cv-1723 (AJF/JFA)

Dear Sir or Madam:

Enclosed is the first page of a complaint filed in the United States District Court for the Eastern District of Virginia regarding this domain name. We have sent a full copy of the complaint as filed to you via electronic mail. If you did not receive the full copy, please let us know.

Pursuant to 15 U.S.C. § 1125(d)(2)(A) we are providing you with notice of the Plaintiff's intent to proceed *in rem* in this action.

If you have any facts or law regarding this matter that you believe we should be made aware of, please let us know.

Regards,



Rebecca J. Stempien Coyle

RJSC:elb
Enclosure

ATTACHMENT 2

Paul Grandinetti

From: Taesong Chong <komorijin@gmail.com>
Sent: Thursday, December 31, 2015 8:48 PM
To: Paul Grandinetti
Subject: Re: U.S. Federal In Rem Action Filed in Regard to Domain Name 3DCAMERA.com

Dear Rebecca,

I'm owner of 3dcamera.com and I have purchased it in 23 April 2014 at Namejet.com.

You can check it out contact via Namejet.com

Order#:556115293

I think that your client had dropped it. It has passed 1 year and half from when I purchased the domain.

It means your client didn't renewal it. because Domain must renewal once a year. If not renewal, I will drop and anyone can register it.

Or You client may be one of cybersquatter. because I don't understand. Why now? It has passed a year and half! If your client was real owner and stolen the domain. must took action at that time.

Now I'm running website with 3dcamera.com. If your client trying to still my domain. I'm going to take legal action.

Yours truly,
Taesong Chong

2016-01-01 4:05 GMT+09:00 Paul Grandinetti <mail@levygrandinetti.com>:

Dear Sirs:

The attached Complaint has been filed in the United States District Court for the Eastern District of Virginia regarding this domain name.

Pursuant to 15 USC 1125(d)(2)(A) we are providing you with notice of the Plaintiff's intent to proceed in rem in this action.

If you have any facts or law regarding this matter that you believe we should be made aware of, please let us know.

Regards,

Rebecca Stempien Coyle

Levy & Grandinetti

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Suite 304
Washington DC 20036

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mail@levygrandinetti.com

Attorneys for Plaintiff

Associated Recovery, LLC